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**BellSouth Telecommunications, Inc**

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guy.hicks@bellsouth.com

T.R.A. DOCKET ROOM

April 6, 2004

**Guy M. Hicks**

General Counsel

615 214 6301

Fax 615 214 7406

**VIA HAND DELIVERY**

Hon. Deborah Taylor Tate, Chairman  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243

Re: *Docket to Establish Generic Performance Measurements, Benchmarks  
and Enforcement Mechanisms for BellSouth Telecommunications, Inc.*  
Docket No. 01-00193

Dear Chairman Tate:

Consistent with the terms of the Settlement Agreement relating to performance measurements approved by the Authority in this proceeding, BellSouth is filing fifteen copies of a Notification Report for the May 2004 data month and a Preliminary Notification Report for the data month of June 2004. These Reports are being filed with all of the state public service commissions in BellSouth's nine-state region.

Copies of the enclosed are being provided to counsel of record. Thank you for your assistance in this regard.

Very truly yours,



Guy M. Hicks

GMH.ch



BellSouth Telecommunications, Inc  
175 East Capitol Street, Suite 790  
Post Office Box 811  
Jackson, MS 39205

Thomas B. Alexander  
General Counsel-Mississippi

601 961 1700  
Fax 601 961 2397

April 5, 2004

Via Hand Delivery

Mr. Brian U. Ray  
Executive Secretary  
Mississippi Public Service Commission  
Post Office Box 1174  
2nd Floor, Woolfolk Building  
Jackson, Mississippi

**FILED**

APR - 5 2004

MISS. PUBLIC SERVICE  
COMMISSION

Re: MPSC Docket No. 97-AD-321 Consideration of the  
Provision of In-Region InterLATA Services By  
BellSouth Telecommunications, Inc. Pursuant to  
Section 271 of TA 96

Dear Brian:

On August 1, 2002, BellSouth filed performance data change notifications for September and preliminary October 2002 in the above-referenced docket. BellSouth notified the Commission that it would continue to file such notices on a going-forward basis pursuant to the Data Notification Policy adopted by the Georgia Public Service Commission. Consistent with the Data Notification Policy, BellSouth is filing a Notification Report for the May 2004 data month and a Preliminary Notification Report for the data month of June 2004. The proposed changes will be discussed at the April 7, 2004 industry conference call.

There are two additional matters that BellSouth would like to bring to the attention of the Commission and the parties. First, in its January 2004 Data Notifications filed on December 1, 2003, BellSouth provided notice to remove Special Access services that are erroneously being included in certain of the BellSouth Retail Analog data (Item No. 9). Although BellSouth expected to implement this change with January data, the change will be implemented with March 2004 data instead.

Second, in its October 2003 Data Notification filed on September 2, 2003, BellSouth provided notice of changes to the way denial and restoral orders that are bulk completed are counted. This change, which was Item No. 5 on the Proposed September 2003 Data Notification, was not implemented completely in Florida and Tennessee. BellSouth will make additional changes with June 2004 data to address this problem.



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Brian U. Ray  
April 5, 2004  
Page 2

BellSouth is submitting fifteen (15) copies of the above documents for filing in the above-referenced docket. An original certificate of service also accompanies this filing. I am also serving a copy of the above documents on Robert G. Waites for the Staff.

An extra copy of this filing is also enclosed. It would be appreciated if you would stamp same as "Filed" and return to me for our records. Finally, by copy of this letter, I am serving all counsel of record with a copy of the above documents.

If you have any questions or wish to discuss, please do not hesitate to call me.

With kindest regards, I remain

Sincerely yours,

A handwritten signature in black ink that reads "Tom Alexander". The signature is written in a cursive, flowing style.

Thomas B Alexander

TBA/mls

Enclosures

cc: Robert G. Waites, Esq., Executive Director, MPUS (w/enclosures)  
George M. Fleming, Esq., General Counsel, MPUS (w/enclosures)  
David L. Campbell, Esq., General Counsel, MPSC (w/enclosures)  
All parties of record (w/enclosures)

**FILED**

APR - 5 2004

MISS. PUBLIC SERVICE  
COMMISSION

**PRELIMINARY JUNE 2004 DATA NOTIFICATION**

BellSouth is considering making the changes described in this document to generate results for the June 2004 data month. Results for the June 2004 data month will be posted as follows:

Preliminary results     July 21, 2004  
Final results             July 30, 2004

BellSouth provides Data Notifications each month in compliance with the Georgia Public Service Commission's Order of July 19, 2002. This order specifies that when BellSouth proposes making any changes to the methods by which performance data is calculated, it must provide written notice. This notice must be provided on the first business day of the month before the data month in which the change will be made. BellSouth must also provide notification if it is considering making changes to the method of calculating data for the following month.

The "Affected Measures" described in this notice are those set forth in the Georgia Service Quality Measurement (SQM) Plan, unless otherwise noted. All "Impact of Change" descriptions are stated at the measurement level, unless the sub-metric level is specified.

**Ordering Measurements**

(1) *Affected Measures:* O-7 & O-8

*Description of Change:* Currently, BellSouth is calculating the Reject Interval for non-mechanized Trunk ASRs from the initial received date, without considering subsequent versions. BellSouth proposes to correctly identify and align the appropriate response timestamp with the corresponding version of the ASR. This modification will also allow for the proper reporting of these measures by assuring that the Reject occurred in the correct reporting period. (RQ4862)

*Impact of Change:* BellSouth continues to investigate the impact of the proposed change and will quantify this impact as soon as possible.

(2) *Affected Measures:* O-11 (Alabama, Kentucky, Mississippi, and South Carolina)

*Description of Change:* Currently, in the states where multiple responses under this measure are reported, Local Interconnection Trunks are not included as a product on the Aggregate and 12 month reports. Additionally, they are not included on the multiple response regional reports for this measure. BellSouth proposes to correct both these reporting problems. (RQ5123)

*Impact of Change:* None.

(3) *Affected Measures:* O-7

*Description of Change:* Currently, a CLEC can respond to a fatal reject with the same CC, PON and Version. For LSRs that have LNP requests, BellSouth is not always able to associate this LSR with the appropriate receipt time. BellSouth proposes to add an additional key to correctly identify the receipt time of this LSR. (RQ5124)

*Impact of Change:* For January 2004, 49 of 2451 (2%) LNP fatal reject records in the region were not counted as a result of this issue.

(4) *Affected Measures:* O-9 & O-11

*Description of Change:* Currently, BellSouth is not correctly associating the confirmed timestamps with ASRs submitted for Local Interconnection Trunks. BellSouth proposes to correct the code to capture responses for Local Interconnection Trunks. (RQ5134)

*Impact of Change:* For January 2004, the result for Local Interconnection Trunks under Measure O-11 would change from 84.78% to 100% in Tennessee.

**Provisioning Measurements**

(5) *Affected Measures:* P-4 (Louisiana)

*Description of Change:* Currently, the MSA Aggregate One Month reports for OCI display an incorrect Average Interval for both BST and CLECs. BellSouth proposes to correct the average interval to display the correct average per product. (RQ5024)

*Impact of Change.* For December 2003 data, the average interval for Alexandria, LA, MSA-Resale Business Non-Dispatch, the metric would change from 0.0 to 2.0 and for Retail Business, the metric would change from 0.0 to 1.73 days.

(6) *Affected Measures:* P-7C

*Description of Change:* Currently, BellSouth is not displaying all disaggregations on the 12-month report when there is no data to place on the historical report. BellSouth proposes to display all disaggregations on the 12-month report even when no data is present in the reporting period. (RQ5029)

*Impact of Change.* None.

- (7) *Affected Measures:* P-7, P-7A, P-7C & P-8

*Description of Change:* BellSouth proposes adding new fields to the raw data and Other Supporting Data File (CTOVR\_CMPLTN\_DTTM, CTOVR\_KEY, SO\_CMPLTN\_DT). The addition of these fields will have no immediate impact on replicating the SQM reports but would be available for use with future enhancements. (RQ5044)

*Impact of Change:* None.

- (8) *Affected Measures:* P-2B

*Description of Change:* Currently, for % Orders Given Jeopardy Notice, the numerator includes orders where the committed date of facility resolution is within the reporting period. BellSouth proposes to implement coding to capture orders with a due date in the reporting period instead of the committed date of the facility resolution in the reporting period consistent with the SQM. (RQ5107)

*Impact of Change:* For December 2003, in Florida, for % Jeopardy – Mechanized, UNE Loop + Port Combinations, Dispatched, the numerator would change from 233 to 176. This would cause the result to change from 6.95% to 5.25%.

- (9) *Affected Measures:* P-2A (Florida and Tennessee)

*Description of Change:* Currently, for % Orders Given Jeopardy Notice  $\geq 48$  Hours, BellSouth is using the committed due date of the facility resolution to determine which orders to include in the denominator of this measure. BellSouth proposes to capture orders with the committed due date in the reporting period in Florida and Tennessee for both the numerator and denominator consistent with the SQM. (RQ5107)

*Impact of Change:* For December 2003 in Florida, the Percent Jeopardy Notice  $>48$  Hours Mechanized, the UNE Loop + Port Combination Dispatch disaggregation, the denominator would change from 233 to 176. This would cause the result to go from 75.5% to 100%.

- (10) *Affected Measures:* P-11 (Florida, Georgia, and Tennessee)

*Description of Change:* BellSouth is currently including "C" orders written in response to LSRs with an ACT of 'C' and an LNA of 'D'. Since these orders are disconnect orders and disconnect orders are excluded from this measure consistent with the SQM, BellSouth proposes to change the code to correct the problem. (RQ5132)

*Impact of Change.* For January 2004 Regional data, 34 orders would be excluded from the volume of this measure. Excluding these records would have less than a .01% effect on this measure

#### **Special Access Measurements**

- (11) *Affected Measures:* SA-7 (Tennessee)

*Description of Change:* Currently, the 12-Month SRS Report for Past Due Circuits, "% Cancellations After FOC Due Date" is not being produced in Tennessee. BellSouth proposes to produce this report. (RQ5120)

*Impact of Change:* None.



**FILED**

APR - 5 2004

MISS. PUBLIC SERVICE  
COMMISSION

**PROPOSED MAY 2004 DATA NOTIFICATION**

BellSouth proposes making the changes described in this document to generate results for the May 2004 data month. Results for the May 2004 data month will be posted as follows:

Preliminary results    June 21, 2004  
Final results            June 30, 2004

BellSouth provides Data Notifications each month in compliance with the Georgia Public Service Commission's Order of July 19, 2002. This order specifies that when BellSouth proposes making any changes to the methods by which performance data is calculated, it must provide written notice. This notice must be provided on the first business day of the month before the data month in which the change will be made. BellSouth must also provide notification if it is considering making changes to the method of calculating data for the following month.

The "Affected Measures" described in this notice are those set forth in the Georgia Service Quality Measurement ("SQM") Plan, unless otherwise noted. All "Impact of Change" descriptions are stated at the measurement level, unless the sub-metric level is specified.

**Ordering Measurements**

(1) *Affected Measures:* OSS-1

*Description of Change:* During the conversion process of mechanizing the OSS-1 measure, BellSouth identified several issues with the reporting of OSS-1 data. BellSouth proposes the following changes to be made to correct this reporting: (i) add additional filter to more accurately identify transactions, contract events, and timestamps for queries launched through EDI, LENS, and TAG/XML; (ii) include omitted DD and DSAP contract events in transaction reporting; (iii) eliminate extraneous contract events, such as RSAG queries by DSAP; (iv) correct reporting of RSAG Transactions as DSAP transactions in North Carolina; and (v) add additional constraints to more accurately capture and report response intervals as summation of events and to properly associate transactions and events to the appropriate reporting period. This proposed change was Item (2) on the Preliminary May Data Notification filed on March 1, 2004. (RQ5053, RQ5054, RQ5055, RQ5056, and RQ5057)

*Impact of Change:* For January 2004, the CRIS/LENS average call per second would increase from 2.86 to 3.02 seconds, and the TAG/DSAP average call per second would decrease from 1.48 to 0.70 seconds.

### Provisioning Measurements

- (2) *Affected Measures.* P-7A (Florida, North Carolina, and Tennessee)

*Description of Change:* Currently, for this measure, BellSouth reports both IDLC and Non-IDLC data on the same report. BellSouth also produces the same Non-IDLC data in another report. BellSouth proposes to remove the Non-IDLC data from the IDLC report, as it is duplicative. This proposed change was Item (3) on the Preliminary May Data Notification filed on March 1, 2004. (RQ4872)

*Impact of Change:* None

- (3) *Affected Measures.* P-12 (North Carolina)

*Description of Change:* Currently, LNP Percent Missed Installation Appointments data is being reported for North Carolina, even though this measure is not part of the North Carolina SQM. BellSouth proposes to remove this measure consistent with the SQM. This proposed change was Item (4) on the Preliminary May Data Notification filed on March 1, 2004. (RQ4885)

*Impact of Change:* None

- (4) *Affected Measures:* P-11 (Florida, Georgia, and Tennessee)

*Description of Change:* Currently, BellSouth classifies any LEO order as partially mechanized for this measure if it has a character string of "t-signout" in the audit log. BellSouth has determined that some orders with this code were being completed without service representative intervention. BellSouth proposes providing an additional check by looking at the SOCS history file for user ID's to verify that the order is partially mechanized. This proposed change was Item (5) on the Preliminary May Data Notification filed on March 1, 2004. (RQ4959)

*Impact of Change:* For January 2004, in the region, 220 fully mechanized orders in Florida, Georgia, and Tennessee were included in the partially mechanized volume of the Service Order Accuracy metric. The change to the metric is less than 0.01%.

- (5) *Affected Measures:* P-7C

*Description of Change:* BellSouth has discovered that it is overstating circuit counts for this measure. BellSouth proposes to change the lookup tables to accurately determine the appropriate circuit count. This proposed change was Item (6) on the Preliminary May Data Notification filed on March 1, 2004. (RQ4988)

*Impact of Change:* For December 2003, in Georgia, the trouble report rate would change from 57% to 1.07%. For the same period in Florida, the trouble report rate would change from .46% to .88%.

(6) *Affected Measures:* P-7A

*Description of Change:* Currently, BellSouth is producing summary rows on the one-month aggregate report for this measure, even though these rows contain no data and are not required by the SQM. BellSouth proposes removing these summary rows from the report. This proposed change was Item (7) on the Preliminary May Data Notification filed on March 1, 2004. (RQ5000)

*Impact of Change:* None

(7) *Affected Measures:* P-7 (Louisiana only)

*Description of Change:* Currently, for the CLEC MSA reports, some interval buckets are being duplicated. BellSouth propose to eliminate duplication of interval buckets. This proposed change was Item (8) on the Preliminary May Data Notification filed on March 1, 2004. (RQ5003)

*Impact of Change.* None

**M&R Measurements**

(8) *Affected Measures:* MR1, 2, 3, 4 & 5 (North Carolina and Tennessee)

*Description of Change:* Currently, BellSouth is counting troubles and line counts in both the UNE Digital Loop and UNE Other-Design disaggregations. BellSouth proposes to correct this problem by eliminating these circuits and troubles from the UNE Other-Design disaggregation. This proposed change was Item (9) on the Preliminary May Data Notification filed on March 1, 2004. (RQ4972)

*Impact of Change:* Numerator and denominator values for the UNE Other-Design disaggregations will be reduced for the measures impacted. Based on December 2003 data, North Carolina and Tennessee CTRR numerators will be reduced to "0" and line counts will be reduced by approximately 97%.

### **Billing Measurements**

(9) *Affected Measures:* B-10

*Description of Change:* Currently, some billing adjustments that are disputed by BellSouth are erroneously being captured in this measure. BellSouth proposes to change the code to exclude these billing disputes consistent with the SQM. This proposed change was Item (10) on the Preliminary May Data Notification filed on March 1, 2004. (RQ5015)

*Impact of Change:* For December 2003, 89 disputes in the region that were not due within the December reporting period should have been excluded from this metric. The results for the region would have increased from 90.71% to 92.75%.

### **Special Access Measurements**

(10) *Affected Measures:* SA-7 (Florida, Georgia, and Tennessee)

*Description of Change:* Currently, the code is not marking the records that are past due from a previous month in the current month's report. The report is displaying all circuits that are candidates for the Past Due Circuits measure from the previous month, including those circuits that are past due. BellSouth proposes to display all the circuits due in the current month, but have an original committed due date in a previous month, as the volume for this measure consistent with the SQM. Once the base is established, the report will display any circuit that was past due and canceled, as the numerator for the measure. The metric is determined by dividing the volume into the numerator, times 100. This proposed change was Item (11) on the Preliminary May Data Notification filed on March 1, 2004. (RQ4859)

*Impact of Change:* For November 2003, in Florida, the volume of circuits for the Percent Cancellations after FOC due date would decrease from 50 to 2.

**CERTIFICATE OF SERVICE**

I, Thomas B. Alexander, attorney of record for BellSouth Telecommunications, Inc., ("BellSouth") hereby certify that I have this day caused to be hand-delivered the fifteen (15) copies of BellSouth's Performance Data Change Notifications to Brian U. Ray, Executive Secretary of the Mississippi Public Service Commission, 2nd Floor, Woolfolk Building, Jackson, Mississippi 39201 and I have also caused to be hand-delivered one copy of same to Robert G. Waites, Executive Director, Mississippi Public Utilities Staff, 3rd Floor, Woolfolk Building, Jackson, Mississippi 39201.

I further certify that I have this day caused to be mailed, by United States mail, postage prepaid, a true and correct copy of same to the following parties who previously intervened in this proceeding:

**ATTORNEYS FOR AT&T**

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William Prescott, Esq.  
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**ATTORNEYS FOR KMC TELECOM, INC.**

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John D. McLaughlin, Jr.  
Director, State Government Affairs  
KMC Telecom, Inc.  
1755 North Brown Road  
Lawrenceville, GA 30043

This the 5<sup>th</sup> day of April, 2004.

  
THOMAS B. ALEXANDER



## CERTIFICATE OF SERVICE

I hereby certify that on April 6, 2004, a copy of the foregoing document was served on the following parties, via the method indicated

☐ Hand  
☐ Mail  
☐ Facsimile  
☐ Overnight  
☒ Electronic

Martha M. Ross-Bain  
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